

REMARKS/ARGUMENTS

Claims 1-16 stand in the present application. Reconsideration and favorable action is respectfully requested in view of the following remarks.

In the Office Action, the Examiner has rejected claims 1-12 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Sharma, and has rejected claims 13-16 under 35 U.S.C. § 102(a) as being anticipated by Stewart. Applicant respectfully traverses the Examiner's §§ 102 and 103 rejections of the claims.

The Office Action erroneously alleges that the message body of a digital certificate has geographic information. See, Office Action at page 4. For support of this allegation the Office Action cites to Stewart:

Billing for access to the network communication service, i.e., the amount the "value bucket" is drained or filled, may be based on one or more of a number of factors, including information stored in the digital certificate, such as sponsorship information, the geographic location of the user, demographic information of the user, and charging information of the user. As noted above, geographic location information of the MU may be provided to the network through the AP. This geographic location information may thus be used, in addition to other information, to adjust the billing rate or amount for network access.

See, for example, Stewart at column 3, lines 33-44 (emphasis supplied) and similar language in Abstract. However, the cited portion of Stewart does not actually state that the geographical information is contained in the digital certificate. The Office Action has misconstrued the term "such as" in the cited passage to refer to both the "sponsorship information" as well as the subsequently mentioned "geographical location of the user", the "demographic information" and "charging information of the user." This is clearly an error as will be explained in detail below.

It is respectfully submitted that the cited passage, when viewed in the context of the document as a whole, is properly interpreted such that only the sponsorship information is specified as being in the certificate, the remaining types of information each simply being one of the "one or more factors" referred to in the passage. Furthermore, from the context of the document as a whole, it is respectfully submitted that it is in fact clear that the geographical information is outside the digital certificate and that any other interpretation is nonsensical.

This is established by considering the passage at column 1, line 55, which states that the digital certificate stores non-changeable information, and that the contents of the certificate are determined to be valid and-modified. Moreover, as is clear from the passage beginning at column 2, line 30, the user is a mobile user whose geographical location changes. Clearly, Stewart's geographical information cannot be in the certificate, since the geographical information changes whereas the certificate is said to contain non-changing information. Furthermore, there is no mention of a procedure for incorporating changed information into the certificate in a secure manner, which a person skilled in the art would understand to be necessary if the geographical information were to be incorporated into the certificate each time the geographical location of a user changed.

In addition, it is stated on numerous occasions in the text, such as at column 2, line 55, column 5, line 55, and even in the Office Action's cited passage at column 3, line 40, that the access points (APs) provide the geographical information, whereas the digital certificate is installed on the client computer. Clearly, the geographical information provided by the access points cannot be in a digital certificate if the digital

certificate is on the client computer. In any event, there appears to be no reason for the geographical information to be transmitted in the digital certificate from a client computer, since it is already transmitted by the access point.

Returning to the detailed description of the Stewart embodiments, it appears that the passage at column 9, lines 35-58 describes in detail how the digital certificate is used. Again, it is clear that sponsorship information is in the digital certificate, but there is no mention of geographical information. In addition, at column 12, lines 33-38, it is made clear that the digital certificate can contain a reference to a database which stores information that changes frequently, whereas the digital certificate itself stores information that changes less frequently. Clearly, it follows that Stewart's geographical information is stored in the database rather than the digital certificate, since the geographical information changes frequently for mobile users. Indeed, it is noted that there is simply no mention or suggestion in Stewart that the geographical information is static.

Since Stewart makes no mention or suggestion of providing geographical information in a digital certificate, it is not believed necessary to discuss Sharma which has been cited only for "teaching a forwarding node." See, Office Action at page 4. Accordingly, all of claims 1-16 patentably define over the cited art, taken singly or in combination, for the reasons given above.

Therefore, in view of the above remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-16, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response

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or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

Respectfully submitted,

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